

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**SHIRLEY A. PATRICK**  
**Debtor**

**CASE NO. 13-51664-KMS**  
**Chapter 7**

**KIM R. LENTZ, as Chapter 7 Trustee for**  
**The Bankruptcy Estate of SHIRLEY A. PATRICK**

**PLAINTIFF**

**V.**

**Adversary Proceeding 14-05016 KMS**

**LEGAL HELPERS DEBT RESOLUTION, L.L.C.,**  
**MACEY, ALEMAN, HYSLIP & SEARNS,**  
**THOMAS G. MACEY, JEFFREY J. ALEMAN**  
**JEFFREY HYSLIP and JASON SEARNS**

**DEFENDANTS**

**MOTION TO RECONSIDER Dkt No. 13**

COMES NOW Plaintiff, Kimberly Lentz, Chapter 7 Trustee for the Bankruptcy Estate of Shirley A. Patrick, (hereinafter the “Trustee”), and pursuant to 11 U.S.C. §105 files this her motion to reconsider *Dkt. No. 13* and in support thereof would show unto the Court as follows:

1. On June 6, 2014 the Court granted Derek Johnson’s motion for admission pro hac vice.
2. Regarding pro hac vice admissions, Uniform Local Rule 83.1(d)(4) states that the applicant must state:

(G.) the name and address of each court and a full identification of each proceeding in which the applicant has filed an application to appear pro hac vice in this state within the preceding two years; the date of each application; and the outcome of the application;

(H) the style and number of each case, including the name of the court, in which the applicant has appeared as counsel pro hac vice within the immediately preceding 12 months, is presently appearing as counsel pro hac vice, or has pending applications for admission to appear pro hac vice;

3. Mr. Johnson failed to list this information. He has represented LHDR in at least four Mississippi cases: (1) *William & Carla Jenkins v. Legal Helpers Debt Resolution LLC*, Case No.

69 420 0017912 (AAA) (2) *Henderson v. Legal Helpers Debt Resolution LLC (In re Huffman)*, Adv. No. 12-00099; (3) *Henderson v. Legal Helpers Debt Resolution LLC (In re Barry)*, Adv. No. 12-05036-KMS; (4) *Huber v. Legal Helpers Debt Resolution LLC*, Adv. No. 13-05030-KMS.

4. Regarding the standard for admissions, Uniform Local Rule 83.1(d)(7) states:

An application ordinarily should be granted unless the court finds reasons to believe that:  
(D) the applicant has engaged in more than five (5) separate unrelated cases or other matters before the Northern and Southern Districts of the federal courts of this state within the last twelve (12) months immediately preceding the appearance in question;

5. Mr. Johnson is seeking pro hac vice admission in six additional cases. Mr. Johnson is engaged in the “general practice of law” in Mississippi, but is not admitted to practice law in Mississippi. See Miss. Rule of Appellate Procedure, Rule 46.

6. Based upon the foregoing, the Trustee respectfully requests the Court to reconsider *Dkt No. 13* and condition or deny Mr. Johnson’s motion for pro hac vice admission.

WHEREFORE, PREMISES CONSIDERED, the Trustee respectfully requests requests the Court to reconsider *Dkt No. 13* and condition or deny Mr. Johnson’s motion for pro hac vice admission.

RESPECTFULLY SUBMITTED this, the 6<sup>th</sup> day of June 2014.

/s/Jason Graeber.  
Jason Graeber Attorney for Trustee, Kimberly Lentz  
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**CERTIFICATE OF SERVICE**

I, Jason Graeber, Trustee, Kimberly Lentz, do hereby certify that I electronically filed a motion to reconsider with the Court via the ECF system, which provides notification of said filing to all counsel of record.

*/s/Jason Graeber* .  
Jason Graeber

Dated, this the 6<sup>rd</sup> day of June 2014.